AO 91 (Rev. 11/11) Criminal Complaint

FILED

UNITED STATES DISTRICT COURT

December 08, 2021

CLERK, U.S. DISTRICT COURT

	for the	WESTERN DISTRICT OF TEXAS			
WESTERN	District of	TEXAS	BY:	Jackson	
United States of America v. Antonio Alcala (1) aka Edgar Gonzalez-Mata Julio Mireles (2))))))	Case No. SA-21-MJ-	01379	DEPUTY	
Defendant(s)	_				

Defendant(s)								
	CRIMINAL CO	MPLAINT						
I, the complainant in this case	, state that the following i	s true to the best of m	ny k nowledge and belief.					
On or about the date(s) of December	ber 7, 2021	in the county of	Bexar	in the				
Western District of Tex	as , the de	fendant(s) violated:						
Code Section 21 USC 846, 841(a)(1), 841(b) (1)(A); 21 USC 841(a)(1), 841(b)(1)	-Conspiracy to distribute an mixture or substance contar-Possession with intent to containing methamphetamir-Alien in possession of a fire	ining methamphetamin listribute more than 500 ine; rearm	o distribute more than 500 ge; e; o grams of a mixture or sub	stance				
(A): PENALTIES: 10 y		10 years to life imprisonment, \$10,000,000 fine, 5 years to life						
18 USC 922(g)(5)(A) ■	supervised release; 100 mandatory special assessment; Up to 10 years imprisonment, \$250,000 fine, 3 years supervised release; \$100 mandatory special assessment							
This criminal complaint is bas	sed on these facts:							
See attached affidavit Continued on the attached	l sheet.	/	Complainant's signature					
Sworn to before me and signed in Sworn to telephonically and signed		Joseph Lyan,	DEA Special Agent Printed name and title					
Date: <u>December 8, 2021 at 1:31</u> p.m	L.	-Ely	Judge's signature					
City and state: San Antonio, Te	exas	Elizabeth S. Ch	nestney, U.S. Magisti Printed name and title	rate Judge				

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

BACKGROUND AND EXPERIENCE

I, Joseph Evans, being duly sworn, do depose and state:

I have been employed as a Special Agent with the DEA since January 2020 and am presently assigned to the DEA, San Antonio District Office (Group D-54). I am a law enforcement officer of the United States within the meaning of Title 18, US Code 2510(7), who is empowered to conduct investigations of, and make arrests for, narcotics offenses enumerated in Title 21, United States Code. I have received training in the investigation of federal drug and money laundering crimes, including, but not limited to Title 21 US Code 841, 846 and 959 and Title 18, US Code 2, 1956 and 1957. I have discussed with numerous law enforcement officers, defendants, and informants, the methods and practices used by chemical and narcotic distributors. I have acted in an undercover capacity and conducted numerous narcotic transactions. I have been an affiant on several federal and state complaints and warrants.

PROBABLE CAUSE

On December 7, 2021, at approximately 4:30 PM, law enforcement officers saw a red Chevrolet Silverado bearing Texas tag PJH9655 commit a traffic infraction (failure to signal) near S. Zarzamora Street and Brady Blvd. SAPD marked units conducted a traffic stop of the Silverado near the 1500 Block of Brady Blvd. Once the vehicle came to a complete stop, the driver, later identified as Antonio ALCALA, and the passenger, later identified as Julio MIRELES, both exited the vehicle and started running westbound on Brady Blvd and US-90. SAPD officers were in uniform with badges and gun belts. SAPD officers gave verbal commands to ALCALA and MIRELES to stop, but ALCALA and MIRELES kept running.

A short time later, SAPD officers and DEA agents apprehended ALCALA and MIRELES near the intersection of US-90 and S. General McMullen Drive, and detained them for further investigation. An SAPD K-9 unit responded to the scene. A narcotics detection dog conducted a free air sniff and alerted to the rear driver's side of the vehicle. Law enforcement officers found a duffle bag inside that held nine plastic grocery bags. Inside the grocery bags was a clear crystal-like substance. A narcotic field test was conducted upon the crystal-like substance which had a positive presumptive reaction for the presence of crystal methamphetamine. The crystal methamphetamine weighed approximately nine kilograms.

In addition, law enforcement officers located a two-tone Springfield Armory XD-S 9mm pistol (serial # XS930932) inside the center console of the vehicle. It was loaded with a magazine that held eight rounds. The frame of the pistol was stamped, "MADE IN CROATIA".

Both ALCALA and MIRELES had Mexican identification cards. After receiving Miranda warnings, ALCALA stated that he was in the United States illegally, and MIRELES stated that he has previously been arrested for illegal re-entry into the United States.

Based	upon	the	foregoi	ng, I	submit	that	there	is	probable	cause	to	believe	that	on
Decem	ber 7, 2	2021,	ALCA	LA ar	nd MIREI	LES vi	olated	Titl	e 21, Unit	ed State	s Co	ode, Sect	ions 8	346,
841(a)(1), and 841(b)(1)(A), and Title 18, United States Code, Sec						Ī	DEA/Special Agent Joseph Evans, III							
Subscr	ribed an	d swo	orn to te	lepho	onically or	n	Dece	mb	er 8	_, 2021				
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HONORABLE ELIZABETH S. CHESTNEY UNITED STATES MAGISTRATE JUDGE